

Public Comments

Types of Comments

Two types of comments on the draft RMP/EIS were considered in preparing the proposed Monument RMP and final EIS. These are (1) substantive comments related to the adequacy of the EIS, and (2) opinions, preferences, and recommendations about how the resources in the planning area should be managed.

Substantive comments related to the adequacy of the EIS fall into one of the following categories.

1.  
Related to inadequacies or inaccuracies in analysis or methodology.
2.  
Recommend reasonable, new alternatives.
3.  
Comments involving substantive disagreements about interpretations of significance.

These comments are specifically addressed beginning on page 5-19.

Other comments express opinions, preferences, and recommendations about how the resources in the planning area should be managed or preference for one of the alternatives presented in the draft EIS. They do not clearly dispute conclusions or information in the draft and do not back up opinions with reasons or citations of authorities or literature. These comments are summarized in the next section of this chapter.

Comments regarding the preliminary wilderness suitability recommendations in the draft EIS are noted and summarized in this analysis, but specific responses are not included. Responses to the wilderness suitability recommendation comments will be included in the final wilderness EIS prepared for Congress.

In an attempt to consider all comments fairly, we interpreted the meaning of comments as they were stated without reading any meaning into them. For example, a comment expressing opposition to higher livestock stocking levels was not interpreted to imply a preference for lower stocking levels unless this was specifically stated.

Public Participation  
Public Comments

Opinions, Preferences, and Recommendations

Advisory Council Recommendations. The Shoshone District Advisory Council passed the following motions concerning the draft Monument RMP/EIS at their July 25, 1984, meeting.

- The Council favors Alternative C subject to the modifications contained in the following motions.
- Other range improvements not identified but not in conflict with other uses should be encouraged.
- The BLM staff should review the L11 (Isolated Tracts) designations in Alternative C before final determination is made.
- To minimize political impacts and to maximize protection of unique areas, the Council asks BLM to re-examine Alternative C from the standpoint of designating a greater number of unique and outstanding areas for special management protection and a lesser area of wilderness.

The Council also adopted the following resolution.

WHEREAS, The Shoshone District Advisory Council is charged with the responsibility of giving advice to the District Manager about any problems which may occur within the District, and

WHEREAS, it has been brought to the attention of the Advisory Council that due to a court decision the BLM will no longer use herbicides to control noxious weeds, and

WHEREAS, the Council is concerned that unless herbicides are used for the control of certain recognized noxious weeds that those weeds will become out of control and cause extreme damage to land within the District as well as to adjoining private and State lands, and

WHEREAS, the BLM is charged with being a land manager and controlling noxious weeds within its district.

NOW, THEREFORE, be it resolved by the Shoshone District Advisory Council that it is in favor of economical and efficient control of noxious weeds. That the use of certain herbicides for certain noxious weeds is the most efficient and economical control measure for such noxious weeds.

The Council further recommends that the Shoshone District and the BLM generally take such action to determine whether or not the use of herbicides upon certain species of recognized noxious weeds is allowable under the existing Federal Laws and regulations.

BE IT FURTHER RESOLVED that this Council recommends that the Shoshone District of the BLM continue to cooperate with the counties of

Lincoln, Gooding, Blaine, and Camas on the control of noxious weeds within that four-county area and all other counties within the Shoshone District.

BE IT FURTHER RESOLVED that this Council recommends that the Shoshone District of the BLM conduct the necessary environmental studies to support the use of herbicides to control noxious weeds within the Shoshone District of the BLM.

Summary of Opinions, Preferences, and Recommendations. The following summary indicates the number of comments expressing opinions, preferences, or recommendations on various topics. The sum of the number of comments expressing particular views on a topic may be greater than the total number of comments dealing with the topic. This is because some commenters expressed several views on the same topic.

The substantive EIS comments addressed at the end of this chapter and Advisory Council recommendations are not included in this summary. Comments from the June 20, 1984, public hearing are included.

Alternative Preferences. Twenty-seven commenters express a preference pro or con for one or more alternatives.

	<u>Favor</u>	<u>Oppose</u>
Alternative A	1	0
Alternative B	6	1
Alternative C	10	4
Alternative D	13	0
Sub-Alternative D	0	1

Lands - Retention or Disposal. Twenty-eight commenters deal with this issue.

- Seventeen commenters oppose land transfers. Five of these are opposed to land transfers in general. Seven commenters are opposed on the basis of wildlife concerns including the transfer of deer and antelope winter range and Isolated Tracts. Four commenters are opposed to transfer of specific parcels; one concerning the Silver Sage Playa, the others concerning grazing allotments. Five commenters believe agricultural development should be limited or should take place elsewhere, or question the need for more agricultural development.

- Nine commenters favor land transfers. Eight of these are interested in obtaining specific tracts, primarily for agricultural development. Two commenters favor development of more agricultural lands.

Public Participation  
Public Comments

- Two other comments on this issue were received. One expresses the desire that another category be established allowing future land transfers to be considered in areas proposed for retention. The other supports giving those deriving their livelihood from land being transferred the first chance to purchase it or the opportunity to match the highest bid.

Wilderness. Sixteen commenters deal with this issue.

- Support is expressed for designation of the following WSAs.

Shale Butte	13 commenters
Sand Butte	15 commenters
Raven's Eye	15 commenters
Little Deer	13 commenters
Bear Den Butte	12 commenters
Shoshone	9 commenters

- One commenter thinks Raven's Eye WSA should be recommended unsuitable or modified to exclude an area of potential gold deposits.

- Three other wilderness related comments were received. One commenter favors closing the road separating Raven's Eye and Sand Butte WSAs. One commenter is opposed to the range improvements and pipeline proposed in the Great Rift WSA in allotment 1206. One commenter is opposed to the new road proposed in the Sand Butte WSA in allotment 0711.

Livestock Grazing. Eight commenters deal with this issue.

- Two commenters mention lower stocking. One favors lower stocking, the other opposes reductions.

- One commenter favors no change from present livestock use in a specific allotment.

- Three commenters are opposed to higher stocking; one concerning higher stocking in ungrazed or under-grazed rangeland, one because of existing poor condition and downward trend, and one because demand doesn't warrant higher stocking.

- Two commenters mention "no grazing." One believes it is not feasible at this time to discontinue grazing. The other believes good condition range shouldn't be grazed.

- One commenter is opposed to Cooperative Management Agreements with ranchers.

Range Improvements. Fourteen commenters deal with this issue.

- Thirteen commenters oppose range improvements. Eight are opposed to the range improvements proposed for Laidlaw Park. One opposes seedings to support higher livestock stocking and four oppose pipelines for cattle. One commenter opposes range improvements within the Great Rift WSA in allotment 1206 and a new road within the Sand Butte WSA in allotment 0711.
- One commenter supports seeding areas with a history of burning to crested wheatgrass to save fire suppression costs and improve the range.
- Seven commenters addressed other aspects of range improvements. Six suggested uses for range improvement funds including fencing camping areas to exclude cattle, accomplishing soil erosion control projects, and restoring/enhancing wildlife habitat. Three commenters presented recommendations for seedings including using more native plant species, including forbs and shrubs in all seedings, and seeding with grass and forb species that show a potential to compete with cheatgrass. One commenter believes brush removal should be done for wildlife, not cattle. One wants vegetation manipulation kept to 15 percent of the area in Laidlaw Park. One suggests a cheatgrass eradication project in Little Park. One says that no removal of brush by herbicides should be done without an EIS or EA with a worst case analysis.

Fire Management. Two commenters deal with this issue.

- One commenter supports the prescribed fire guidelines on page D-6 of the draft EIS.
- One commenter suggests seeding areas with a history of burning to crested wheatgrass to save fire suppression costs and improve the range.

Soil Erosion. Eight commenters deal with this issue.

- Two commenters think soil erosion should be studied in more depth.
- Three favor reducing soil erosion rates below present rates. Two of these suggest reducing erosion to pre-grazing levels.
- Two commenters favor limiting agricultural development in the portion of Power County in the planning area because of erodible soils.
- One commenter states that the erosion rate in the Preferred Alternative is unacceptable.

Wildlife Habitat Management. Fourteen commenters deal with this issue.

## Public Participation

### Public Comments

- Six commenters address big game winter range, including sell no deer or antelope winter range, preserve winter areas for deer and antelope, and rehabilitate winter range with brush seedings.
- Two commenters say the Isolated Tracts program should be expanded, not reduced as in Alternative C. One also says that tracts should not be eliminated from the program because of a lack of access.
- One commenter supports our approach for the ferruginous hawk, Swainson's hawk, Shoshone sculpin, Snake River snail, and candidate threatened and endangered plants.
- One commenter says there should be proposals to restrict cattle access to riparian areas.
- Eight commenters believe the monitoring trigger levels for wildlife habitat are too high.
- Five commenters suggest using range improvement funds for wildlife habitat enhancement.
- Four commenters expressed other views on wildlife habitat management, including habitat should be managed to bring game numbers up to pre-grazing levels, brush removal should be done for wildlife instead of cattle, more preservation of wildlife is needed, and land is most valuable retained in public ownership and improved for wildlife habitat.

Minerals. Two commenters deal with this issue. Both favor minimal restrictions or having more area open to leasing, exploration, and energy and mineral production.

Off-Road Vehicles. Six commenters deal with this issue.

- Four commenters support ORV limitations/closures. Two of these specifically support the Sand Butte ORV closure. One is concerned about the effects on cultural resources of leaving 92 percent of the planning area open to ORVs. One suggests limiting ORV use to 10 to 25 percent of the planning area to prevent aesthetic and environmental damage.
- Two commenters oppose ORV limitations/closures. One opposes the limitations in Cedar Fields because conflicts with other users are few and impacts of ORV use have been negligible. One believes more serious concern is needed for recreation four-wheel drive use in the area.

Recreation. Seven commenters deal with this issue.

- Six commenters suggest more attention to recreation facilities. Four of these suggest following SCORP recommendations. One suggests more

attention to the public need for campsites. Two suggest fencing campsites to exclude cattle. Two suggest better maintenance of the Sand Butte, Bear Trap-Crystal, and Minidoka-Arco roads. One suggests providing good access to wilderness trails.

- One commenter supports designation of the Snake River Rim and Little Wood River SRMAs and suggests enlarging the Little Wood River SRMA to 3,061 acres.

**Cultural and Historic Resources.** Two commenters deal with this issue. One is concerned about the impacts from increased trampling of surface sites due to sheep to cattle conversions. The other is concerned about impacts from leaving 92 percent of the planning area open to ORV use.

**Special Designation.** Thirteen commenters express opinions regarding special designation areas, primarily ACECs.

- Seven commenters support ACEC designation for the Substation Tract. One commenter also suggests a research natural area designation.

- Six commenters address the Silver Sage Playa. Five of these support ACEC designation of the area. One is opposed to transferring the area as proposed in Alternative B.

- Nine commenters address Vineyard Creek. Seven of these support ACEC designation for the area. One also suggests a research natural area designation. One commenter supports protection of Vineyard Lake. One commenter suggests making a road into Vineyard Lake for public access and to prevent tearing up the rest of the area with vehicles.

- Twelve commenters address Box Canyon/Blueheart Springs. Ten of these support ACEC designation for the area. One also suggests a research natural area designation. One commenter says Box Canyon must be preserved. One commenter would like the RMP to recognize a right-of-way application on public land and an agreement between the State of Idaho and the private landowner in Box Canyon. This commenter is not opposed to ACEC designation as long as it does not preclude granting the right-of-way or make implementation of the State agreement impractical. One commenter would like to see public access developed to the public land in Box Canyon.

- Four commenters propose ACEC designation for other areas including Last Chance Kipuka; good vegetation areas of Laidlaw Park, Little Park, north and west edges of the Wapi Flow and kipukas; and the Cedar Fields area.

- Four other comments on special designations were received. One supports preservation of natural grasslands of Sand Butte and the area south and east of Broken Top Butte. One believes more preservation of wild grasslands is needed. One says protecting natural diversity is paramount. One supports special designation for Dry Cataracts and protection of Devil's Corral.

Public Participation  
Public Comments

**Monitoring.** Ten commenters address the monitoring plan for the Monument RMP.

- Eight commenters feel the trigger levels for monitoring wildlife habitat are too high.
- One says the trigger level of 60 percent forage utilization is too high.
- One commenter believes the monitoring program should be reviewed and strengthened.

**Noxious Weeds.** Three commenters think the statement on noxious weeds needs to be expanded or made stronger.

**Substantive Comments Related to the Adequacy of the EIS**

**Public Hearing Comments.** A list of those that testified at the June 20, 1984, public hearing is shown below. Substantive comments related to the adequacy of the EIS and BLM's responses follow.

<u>Name</u>	<u>Representing</u>	<u>Oral Testimony</u>	<u>Response Prepared</u>
William F. Ringert	Earl M. Hardy	X	X
Ronald J. Kondracki	Magic Valley Divers	X	
Roger Bliss	Self	X	X
Charles R. Hisaw	Self	X	
Kraig Dahl	Dahl Farms	X	
Dave Garff	Gooding Carey Act Assn.	X	
Russell A. Czaplicki	Self		

**Comment H-1 - William F. Ringert.** However, the EIS does not reveal the relationship between the private land and public land in the Box Canyon area.

**Response to Comment H-1.** We have added a sentence to the text of the final EIS on page 3-26 stating our estimate of proportion of private to public lands in the canyon.



Comment H-2 - Roger Bliss. Erosion dangers have been listed as moderate to high in the MRMP; however, our experience with the soil after agricultural development in using normal contemporary methods of fertility cultivation has been that of little or no erosion due to wind.

Response to Comment H-2. Using proper conservation practices, erosion can be kept to a minimum, however, these soils still have a moderate to high "potential" for wind erosion based on the soil surveys and the National Soils Handbook of the USDA, Soil Conservation Service, pp. 603-37. This potential exists when these soils are left bare, uncrusted, and unprotected during periods of high wind velocities.

Comment H-3 - Roger Bliss. Productivity. The MRMP does list this as only moderate productivity. Following extensive soil and mineral testing, we found these soils to be extremely rich in minerals and nutrients needed for crop production and low in alkaline salt.

The soil is very deep and consistent, which allows water to drain and move quickly, and has no hardpan or buildup of minerals. These factors result in a very productive soil and growing condition.

Response to Comment H-3. The productivity is moderate because of the climatic conditions in the area, i.e., low rainfall and limited growing season. The physical condition of these soils are too sandy to be classified excellent based on the soil surveys and Land Capability Classification Standards (USDA, Soil Conservation Service, 1961). Nutrient levels are low in relation to many other soils which naturally support more vegetation, e.g., 3,000 lbs./acre as compared to 800 lbs./acre.

Comment H-4 - Roger Bliss. Concerning production. There is a farm budget which is listed in the MRMP. We have, just to supplement that a little, we figured some of the costs that we experience on our own personal farm budget. A hundred and sixty-acre farm would assume the following annual budget in potatoes: An annual revenue assuming 400 sacks to the acre, which we mentioned would be a conservative yield, at what the plan uses as an average cost of \$4.97 a sack, would bring a total of \$1,988 an acre, or a gross of \$381.080.

Tillage costs. We feel the tillage costs used in the plan were quite accurate, although just a little bit overdone. Under contemporary methods, the tillage cost would be what was expressed but not as many times tilling; in our experience we don't till the ground as much as the budget assumes.

Planting costs were about the same. Seed costs we feel were a little high. On the average, we feel \$7.50 would be an appropriate average for what we have had to spend for seed.

Public Participation  
Public Comments

Cultivation and Sencor. Where it assumed that cultivation would take place three times a year, we cultivate once; and we also apply our Sencor spraying at the same time, which cuts quite a little bit out of the assumed budget. Also, in this area we have not yet needed to spray Sencor because there are just not enough weeds to worry about; but we assume down the road that that will become a necessity of our budget.

Fertilizer. We experience on a total fertilizing program approximately \$250 an acre. Pumping, \$30 an acre. Our dig and load, around \$180 an acre. And storage would be the same as was assumed in the plan at \$88 an acre.

That brings a total cost of production annually to \$745.50 an acre, an estimate, or \$119,280.

The interest assumption, we feel was just a little bit high; but that's a little bit nitpicky. We experience 12 to 12 and a half percent annual interest on 12 months, so you can figure that interest on that.

So, we feel that the total cost of production on an annual basis as an average would be \$133,680, which would leave a net profit of \$184,400 on a potato budget.

Response to Comment H-4. The farm budgets prepared for this RMP are designed to be representative of all potential agricultural development lands in the planning area. Any individual application could have significant differences from these budgets depending on soil types, development costs, and crop rotation. It is believed that these budgets do, however, represent a good average of the costs and returns that could be expected area wide. It should be noted that these budgets show a positive net revenue.

Comment Letters. Following are comment letters on the draft and BLM's responses. Several comment letters were received after analysis of comments had begun. They are not printed here, but were considered in preparation of the final EIS if possible.